

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Case No. 24-CR-20375

v.

Hon. F. Kay Behm
United States District Judge

MACK DAVIS,

Violation:
18 U.S.C. § 249(a)(2)

Defendant.

_____ /

SUPERSEDING INFORMATION

The United States Attorney charges:

BACKGROUND

Unless otherwise noted, at all times relevant to this Superseding Information:

1. MACK DAVIS, the defendant, was a resident of the Eastern District of Michigan.

2. From at least in or about July 2023, through in or about June 2024, DAVIS accessed search engines and social media sites to research, post about, and pay tribute to individuals who had conducted mass killings. During that period, DAVIS also wrote about dozens of mass killers in journals and on other items in his home.

3. From at least in or about July 2023, through on or about June 17, 2024, DAVIS plotted to commit a mass killing, a process he documented in journals and in online manifestos.

4. During that period, DAVIS made written “Mission Needs” and “Mission Haves” lists in his journal of weapons and tactical gear that he either wanted to acquire or already owned to carry out his mass killing. By June 17, 2024, DAVIS crossed off all of the items on his “Mission Needs” list and had acquired weapons and tactical gear including two firearms, magazines, hundreds of rounds of ammunition, a crossbow and arrows, assorted bomb-making parts, smoke grenades, tactical gear and clothing, and several knives (one of which was inscribed by Davis with the phrase “FAGGOT Killer” on the blade).

5. From at least in or about April 2024, through on or about June 17, 2024, DAVIS solidified his plan for committing a mass killing, a process he posted about on the social media site Discord. During that period, DAVIS researched a mass killer who had shot and killed multiple victims in a gay bar in another country. DAVIS also took “selfie” photographs that emulated “selfies” that the mass killer had taken, including a selfie that the mass killer had taken in front of the gay bar he later attacked. Further emulating the mass killer he had researched, DAVIS plotted his own mass killing at a gay bar. Specifically, DAVIS posted on Discord that he intended to commit a mass killing at “Location 1” (a political party headquarters that

DAVIS wrote was “filled with far-left liberal, faggot scum”), before continuing the mass killing at “Location 2” (a nearby bar that DAVIS wrote was “a faggot bar”). Both locations are in the Eastern District of Michigan. DAVIS also researched both locations online, conducted physical surveillance of both locations, and posted about his research and surveillance on Discord. DAVIS also posted his “selfies” on Discord, along with photographs of himself in his tactical gear and with his firearms and knives.

6. On or about April 29, 2024, DAVIS purchased a CBC (Rossi) Model RS22 semi-automatic .22 caliber rifle, which he later shortened to an illegal length so that he could conceal the rifle in a backpack.

7. On or about June 11, 2024, Davis also (in his words) “finish[ed]” purchasing his gear for his mass killing, which included a tactical vest, six additional magazines for his .22 caliber rifle, a chest rig that held magazines, black cargo pants, black tactical gloves, and an “I Hate People” black shirt.

8. On or about June 15, 2024, DAVIS vandalized a car that belonged to his neighbors, whom he knew to be gay, by spray-painting the word “fag” and a “Ø” symbol on the car. The “Ø” matches DAVIS’s online handle, “Ghøst Templar.”

9. On or about June 15, 2024, DAVIS also used Meta AI to search for information related to his local police department’s scanners and received options for monitoring the scanners.

10. On or about June 17, 2024, DAVIS test-fired his shortened .22 caliber rifle and the associated magazines by firing approximately 60 bullets into several of his neighbors' properties, including the car that he had vandalized with the word "fag."

COUNT ONE
18 U.S.C. § 249(a)(2)(A)(ii)(II)
Hate Crime Acts

11. The allegations contained in paragraphs 1 through 10 are realleged and incorporated as if fully set forth herein.

12. From in or about April 2024, through on or about June 17, 2024, in the Eastern District of Michigan, the defendant, MACK DAVIS, willfully attempted to cause bodily injury to a person (that is, individuals associated with Location 1 and Location 2) through the use of a firearm, because of the actual and perceived sexual orientation of individuals associated with Location 1 and Location 2. The offense included an attempt to kill, and the conduct affected interstate and foreign commerce. In connection with that conduct, DAVIS used a channel, facility, and instrumentality of interstate and foreign commerce and employed a firearm that had traveled in interstate and foreign commerce. Specifically, DAVIS used a shotgun and .22 caliber rifle in an attempt to kill individuals at Location 1 and Location 2, because he believed Location 1 and Location 2 were associated with gay people; the firearms DAVIS used had traveled in interstate and foreign commerce; and DAVIS

used the internet and mail in connection with that act, all in violation of 18 U.S.C.
§ 249(a)(2).

KRISTEN CLARKE
Assistant Attorney General
U.S. Department of Justice
Civil Rights Division

DAWN N. ISON
United States Attorney



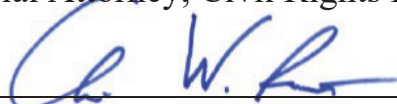
ANTHONY P. VANCE
Assistant United States Attorney
Chief, Branch Offices



FRANCES LEE CARLSON
Assistant United States Attorney



ERIN MONJU
Trial Attorney, Civil Rights Division



CHRISTOPHER W. RAWSTHORNE
Assistant United States Attorney

Dated: December 17, 2024

Companion Case information MUST be completed by AUSA and initialed.United States District Court
Eastern District of Michigan**Criminal Case Cover Sheet****Case Number**
24-CR-20375

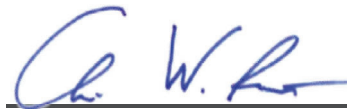
NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information**Companion Case Number:**This may be a companion case based upon LCrR 57.10 (b)(4)¹:**Judge Assigned:**☐ Yes☒ No**AUSA's Initials:** CR**Case Title:** USA v. MACK DAVIS**County where offense occurred :** GENESEE**Check One:** ☒ **Felony**☐ **Misdemeanor**☐ **Petty**☐ Indictment/ ☐ Information --- **no** prior complaint.☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]☐ Indictment/ ☒ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information****Superseding to Case No:** 24-CR-20375**Judge:** F. Kay Behm

- ☐ Original case was terminated; no additional charges or defendants.
- ☐ Corrects errors; no additional charges or defendants.
- ☒ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)**18 U.S.C. § 249(a)(2)(A)(ii)
(II)**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**December 17, 2024

Date



Christopher W. Rawsthorne
 Assistant United States Attorney
 210 Federal Building
 600 Church Street
 Flint, Michigan 48502
 Telephone: (810) 766-5177
 Email: Christopher.Rawsthorne@usdoj.gov
 WI Bar# 1059889

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.